

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
v. § CRIMINAL NO. 4:19CR822
§
JAMES RAY BUNN §

UNOPPOSED MOTION TO CONTINUE SENTENCING

TO THE HONORABLE JUDGE GREGG COSTA:

Defendant James Ray Bunn (Defendant) respectfully moves the court to continue Sentencing for a period of at least 30 days. Sentencing is Currently set for April 27, 2022.

On November 23, 2021, Defendant entered a plea of guilty as to Counts 2 and 4 of the indictment. A PSI was ordered and that was completed on March 23, 2022. Defendant's Objections and Corrections were timely filed on April 6, 2022 and a final PSI issued on April 20, 2022. Defense Counsel and Government counsel conferred on April 19, 2022 and again on April 25, 2022 regarding an issue brought up in the objections to PSI. Defendant believes that more time is needed to verify information that may have been put on the record at the plea date. Defendant believes this information is crucial to Sentencing and requests a continuance of

sentencing so that he may order the transcript from the re-arrainment hearing.

Defendant therefore requests a continuance of at least 30 days to order transcript at an expedited request.

This motion is filed in good faith and not for the purpose of delay.

WHEREFORE, PREMISES CONSIDERED, Defendant request the Court grant this motion.

Respectfully submitted,
/s/ Raymundo J. Vazquez
Raymundo J. Vazquez
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*Attorney for Defendant,
James Ray Bunn*

CERTIFICATE OF SERVICE

I, Raymundo J. Vazquez, certify that a true and correct copy of this document has been served on the Assistant United States Attorney via email, on April 25, 2022.

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez

CERTIFICATE OF CONFERENCE

The foregoing motion was discussed with the Assistant United States Attorney on April 25, 2022. The government's position is as follows:
UNOPPOSED.

Dated: April 25, 2022

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez

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ORDER

Defendant's Motion to Continue the Deadlines and Sentencing is:

Granted, Sentencing will be reset to _____, 2022;
 Denied.

Signed on this the _____ day _____, 2022.

Judge Gregg Costa
United States District Judge